



February 12, 2021

Lt. Colonel Mike Dunlap
Wisconsin Air National Guard; 115CES/CEIE
Dane County Regional Airport
3110 Mitchell Street, Building 1210
Madison, WI 53704

REF: BRRTS # 02-13-585319

Subject: Approval of Materials Management Plan for Flight Simulator Building
Wisconsin Air National Guard 115CES/CEIE, Dane County Regional Airport, Madison

Dear Lt. Colonel Dunlap:

The Wisconsin Department of Natural Resources (DNR) received a revised Materials Management Plan (MMP) for the F-35 Flight Simulator building (Flight Simulator) to be located on the Wisconsin Air National Guard (WANG) base at Truax Field in Madison. The MMP was sent electronically from you to Steve Ales on February 10, 2021.

The Flight Simulator will occupy the site currently housing Building 410 and part of the adjacent currently open area located north of Building 410. Building 410 will be removed. The Flight Simulator is one of several construction projects that will be undertaken to modify the base for the placement of F-35 jets in 2023.

Soil and groundwater samples were collected from 10 locations in the area where the Flight Simulator is to be constructed. The samples were analyzed for volatile organic compounds (VOCs) and Per and Polyfluoroalkyl substances (PFAS). The sampling results were included in your February 10, 2021 submittal.

Soil

Soil samples were collected at 10 locations in the area of the Flight Simulator. VOCs were not detected in any of the soil samples. PFAS compounds were sampled at all locations with two samples collected per boring; one at approximately 2 feet below ground surface and the other at approximately 1 foot above the water table. PFOS was the only PFAS compound detected with concentrations ranging from 0.446 ng/gm to 1.15 ng/gm.

Wang's MMP indicates that soil excavated from this project and not reused as backfill under buildings or other impervious surface on this project will be taken to a solid waste landfill. This is an appropriate method for handling excess soil. Solid waste landfills in Wisconsin make the decision as to which wastes, they will and will not accept. WANG will need to arrange with the landfill for accepting the material. If an alternative method of soil management is desired, WANG must discuss the proposed management alternative with DNR prior to implementing.

Groundwater

Groundwater samples were collected at each of the 10 sampling locations. Four VOCs were detected in these samples and all concentrations were below NR 140, Wis. Admin. Code enforcement standards. PFAS compounds were detected at all 10 locations. Wisconsin does not currently have promulgated groundwater quality standards

for any PFAS compounds. Results from the sampling for PFOA, PFOS, NEtFOSE, NEtFOSA, NEtFOSAA and FOSA did exceed the NR 140 standards recommended by the Wisconsin Department of Health Services for these compounds (20 ng/l individually and combined).

Groundwater dewatering is not anticipated for this construction project. This is based on the depth to water from soil borings completed at this location and from experience WANG has gained from other projects at WANG completed in the past. As such, DNR understands that WANG does not intend to seek a wastewater discharge permit ahead of construction activities. If groundwater is encountered, the MMP states the water will be containerized and sampled, and WANG will work with the DNR to review options for disposing the water based on sampling results.

Approval

The MMP is **approved** subject to the following conditions:

1. Management of excavated soil in conformance with the approved MMP shall be completed within one year of the effective date of this letter unless a written extension of this condition is obtained from the DNR.
2. The Wisconsin Air National Guard shall manage excavated material in conformance with the approved MMP and shall notify the DNR within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the DNR or if there are visual or olfactory indications of a contaminant discharge. That material must be segregated and tested to determine appropriate disposal options.
3. If areas of unanticipated soil contamination or discovery of underground storage tanks, piping, drums, etc. are encountered, the DNR shall be notified within 24 hours and appropriate actions to investigate, evaluate and deal with the situation shall be proposed. Notification of discharge shall be submitted to the DNR in accordance with s. NR 706.05(1).
4. The Wisconsin Air National Guard is responsible for obtaining any local, federal or other applicable state permits to carry out this project. If more than one acre of land is disturbed, a stormwater permit may be required. Contact the DNR's Stormwater Manager to determine what, if any, permit is needed.
5. The Wisconsin Air National Guard shall comply with requirements of s. NR 718.12(2)(d) and (e) Wis. Adm. Code as needed or appropriate.
6. The Wisconsin Air National Guard shall submit a documentation report to the DNR within 90 days of substantial completion of the redevelopment project. The report shall contain the following items:
 - a. As-built drawings documenting compliance with the above conditions of approval;
 - b. A narrative description of how the above conditions were accomplished including relevant documentation;
 - c. Color photographs documenting construction aspects addressed in this approval; and
 - d. Documentation of excavation and soil placement activities. The report shall include the description of the total volume and final location/disposition of relocated material.

The DNR reserves the right to require the submittal of additional information or to modify or revoke this MMP approval if the Wisconsin Air National Guard fails to comply with the requirements of the proposed MMP. The DNR also retains its right to modify or revoke this approval if circumstances or conditions change, or if new information is found which would warrant modification or revocation of this approval.

If you have any questions regarding this approval please contact Steve Ales at stephenm.ales@wisconsin.gov or 608-400-9187.

Sincerely,

A handwritten signature in blue ink, appearing to read "St L Martin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Steven L. Martin, P.G.
South Central Region Team Supervisor
Remediation & Redevelopment Program Supervisor

Cc: Steve Ales – Remediation & Redevelopment Program